

1 LEONARDO M. RAPADAS
United States Attorney
2 BEVERLY R. McCALLUM
Assistant United States Attorney
3 District of the Northern
4 Mariana Islands
Horiguchi Building; Suite 300
5 P.O. Box 500377
Saipan, MP 96950
6 Tel: (670) 236-2980
Fax: (670) 236-2985

UNITED STATES DISTRICT COURT

DISTRICT OF THE NORTHERN MARIANA ISLANDS

10 || United States of America,

Plaintiff,

No.: CR-08-00017

V.

13 || DOMINIC CHIPWELONG, *et al.*

Defendants

**MOTION TO CONTINUE
TRIAL**

(First Request)

18 The United States, by and through undersigned counsel, respectfully moves this Court to
19 continue the trial in the above-captioned matter, which is currently set for Monday, July 14, 2008, at
20 9:00 a.m., until Tuesday, October 14, 2008, at 9:00 a.m. Defendant Dominic Chipwelong has signed
21 a plea agreement with the United States and is set to enter a change of plea at a hearing on Thursday,
22 July 3, 2008, at 9:00 a.m. Likewise, Defendant James Ochcha has signed a plea agreement and is set
23 to enter his change of plea at a hearing on Tuesday, July 1, 2008, at 9:00 a.m. The remaining
24 defendant, Masaioshy Daikichi Sallem, is still considering a plea offer from the government.
25

Defendant Sallem is a citizen of the Federated States of Micronesia. Were he convicted of the charged offenses, he would face probable deportation. Under these circumstances, it is in the interests of justice for Defendant Sallem to have more time to consider the government's plea offer.

1 Accordingly, a hearing has been set for Thursday, July 3, 2008, at 9:30 a.m., in order for Defendant
2 Sallem to waive his right to a speedy trial. Attorneys George L. Hasselback, Steven P. Pixley, and
3 Robert T. Torres, were consulted on June 30, 2008, and expressed no objection to the requested
4 continuance.

5

6

Respectfully submitted this 1st day of July, 2008.

7

8

LEONARDO M. RAPADAS
United States Attorney
Districts of Guam and
the Northern Mariana Islands

9

10

11

12

s/ Beverly R. McCallum
BEVERLY R. McCALLUM
Assistant United States Attorney

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28